

1 BARRY J. PORTMAN
Federal Public Defender
2 CYNTHIA C. LIE
Assistant Federal Public Defender
3 160 West Santa Clara Street, Suite 575
San Jose, CA 95113
4 Telephone: (408) 291-7753
5 Counsel for Defendant CHANG

6
7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA
9

10 UNITED STATES OF AMERICA,)	No. CR-07-00554 JF
)	
11 Plaintiff,)	<i>EX PARTE</i> APPLICATION FOR
)	MODIFICATION OF PRETRIAL RELEASE
12 vs.)	CONDITIONS
)	
13 DOMINIC CHANG,)	Hon. Patricia V. Trumbull
)	
14 Defendant.)	
)	

15 _____

16 Defendant Dominic Chang hereby requests that the Order Setting Conditions of Release
17 issued by this Court on September 13, 2007 be modified to permit him to travel to Hong Kong
18 from December 26, 2007 to January 10, 2008. This application is based upon the attached
19 declaration of counsel.
20

21 Dated: November 15, 2007

Respectfully submitted,

22 BARRY J. PORTMAN
23 Federal Public Defender

24 /S/

25 CYNTHIA C. LIE
26 Assistant Federal Public Defender